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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR 12-00834 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER THE SPEEDY
v.)	TRIAL ACT FROM DECEMBER 20, 2012 TO
)	JANUARY 30, 2013
MONICO DOMINGUEZ,)	
JUAN DOMINGUEZ, JR.,)	
SHAWN GEERNAERT)	
)	
Defendant.)	
)	

On December 20, 2012, the parties in this case appeared before the Honorable Edward M. Chen for an initial appearance. At that time, the parties represented that the government had just produced to defense counsel a voluminous set of discovery, including multiple CDs worth of video and audio recordings and that the defense would need additional time to review the discovery and to conduct additional investigation. Accordingly, the parties jointly requested an extension of time and stipulated that time should be excluded from December 20, 2012 to January 30, 2013, for effective preparation of defense counsel. The parties represented that granting the continuance was for the reasonable time necessary for effective preparation of

1 defense counsel, taking into account the exercise of due diligence. See 18 U.S.C. §
2 3161(h)(7)(A) and (B)(iv).

3 The parties also agreed that the ends of justice served by granting such a continuance
4 outweighed the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. §
5 3161(h)(7)(A).

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7 IT IS SO STIPULATED:

MELINDA HAAG
United States Attorney

8
9 DATED: January 29, 2013

/s/
RANDY LUSKEY
Assistant United States Attorney

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11
12 DATED: January 29, 2013

/s/
JAI GOHEL
Attorney for Monico Dominguez

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14
15 DATED: January 29, 2013

/s/
JODI LINKER
Attorney for Juan Dominguez Jr.

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17
18 DATED: January 29, 2013

/s/
JOSEPH STOGNER
Attorney for Shawn Geernaert

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21 IT IS HEREBY ORDERED that time is excluded under the Speedy Trial Act from December
22 20, 2012 to January 30, 2013, under 18 U.S.C. § 3161(B)(iv) and 18 U.S.C. § 3161(h)(7)(A).

23
24 IT IS SO ORDERED.

25
26 DATED: 1/31/13

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28
STIP. & [PROP.] ORDER EXCL. TIME
CR 12-00834 EMC

